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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. 08-222-WHA
Plaintiff,	)	
v.	)	DECLARATION OF
	)	TROY CROWTHER
LUKE D. BRUGNARA,	)	
Defendant.	)	

I, Troy Crowther, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am a principal in the firm Piercy, Bowler, Taylor & Kern ("PBTk"), which is an accounting firm located in Nevada.

2. In late 2000, Luke Brugnara engaged PBTk when he was applying for a gaming license. PBTk was hired to review Mr. Brugnara's financial records, including his tax returns.

3. On February 27, 2001, I sent a letter to Mr. Brugnara stating, among other things, that his entities, whether S Corporations or C Corporations are required to timely file tax returns regardless of the amount of income or loss. I also advised that the income, expenses, and other deductions of a regular corporation may not be reported on a pass-through basis by a regular corporations' shareholders. I also noted in the letter that Mr. Brugnara's tax returns for 1994-1999 "omit" the schedule for net operating and/or passive loss carryovers and "omit" the Alternative Minimum Tax Form.

4. On February 27, 2001, Mr. Brugnara called PBTk and asked that we "delete" this

1 letter from our computers.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on 19 day of April, 2010, at Las Vegas, Nevada.  
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7 **TROY CROWTHER**  
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